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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JANET L. SEI,)
Plaintiff and)
Counterclaim Defendant,) Case No.04-CV-6446
vs.) Judge Blanche M. Manning
UNITED STATES OF AMERICA,)
Defendant and)
Counterclaim Plaintiff)

UNITED STATES OF AMERICA,)
Defendant and)
Counterclaim Plaintiff,)
vs.)
KEITH A. SEI,)
Counterclaim Defendant)

FILED

MAY 13 2005

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTUNITED STATES' MOTION FOR ENTRY OF DEFAULT

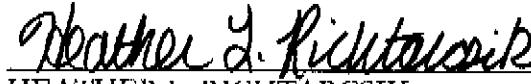
The United States of America, through Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, moves this Court, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, for entry of default against defendant Keith A. Sei on the grounds that he has failed to plead or otherwise defend herein. The Declaration of Heather L. Richtaresik in Support of Motion for Entry of Default, with Exhibit 1, is attached hereto in support of this motion. A proposed

Entry of Default is also included.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

JOEL NATHAN
Assistant United States Attorney



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CERTIFICATE OF SERVICE

I hereby certify that service of the forgoing Motion for Entry of Default has been made upon the following by depositing copies in the United States mail, postage prepaid, on this 12th day of May 2005, addressed to:

Paul Weatherhead
Fernholz & Ehrlich
10 S. LaSalle Street
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Heather D. Richtarsik

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